

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DAN J. BENSON,)
Plaintiff,)
v.) CIVIL ACTION FILE
ANDRES FACEMYER,) NO. 1:13-CV-0595
in his individual capacity,)
Defendant.)

DEFENDANT FACEMYER'S REVISED PROPOSED VERDICT FORM

1. Did Officer Facemyer have arguable probable cause to arrest Mr. Benson?

Yes

_____ No

If you answered “no,” please proceed to the next question. If you answered “yes,” do not answer the remaining questions.

2. Did Officer Facemyer have probable cause to arrest Mr. Benson?

Yes

_____ No

If you answered “no,” please proceed to the next question. If you answered “yes,” do not answer the remaining questions.

3. Please state the amount of compensatory damages that should be awarded to Mr. Benson: \$ _____.

4. Did Officer Facemyer act with malice or reckless indifference to Mr. Benson's federally protected rights?

_____ Yes

_____ No

If you answered "yes," proceed to the next question. If you answered no, do not answer the remaining question:

5. Please state the amount of punitive damages that should be awarded to Mr. Benson: \$ _____.

So say we all on this _____ day of _____, 2015.

Foreperson

Respectfully submitted this 22nd day of January, 2015.

/s/Tamara N. Baines

ROBERT N. GODFREY

Chief Counsel

Georgia Bar No. 298550

TAMARA N. BAINES

Sr. Assistant City Attorney

Georgia Bar No. 032460

LASHAWN W. TERRY

Sr. Assistant City Attorney

Georgia Bar No. 702578

VERONICA L. HOFFLER

Assistant City Attorney

Georgia Bar No. 358799

Attorneys for Defendant Facemyer

City of Atlanta Law Department
55 Trinity Avenue
Suite 5000
Atlanta, GA 30303
(404) 546-4115 (telephone)
(404) 546-8366 (facsimile)
tbaines@atlantaga.gov

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DAN BENSON,

§

Plaintiff,

§

v.

§

§

§

§

ANDRES FACEMYER,

§

Defendant.

§

**CIVIL ACTION FILE
1:13-CV-0595-WSD**

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2015, I electronically filed the foregoing
DEFENDANT FACEMYER'S REVISED PROPOSED VERDICT FORM
with the Clerk of Court using the CM/ECF system, which will automatically send
e-mail notification to the following attorneys of record:

Jeffrey R. Filipovits
Filipovits Law Firm, P.C.
2900 Chamblee-Tucker Road
Building 1
Atlanta, GA 30341

/S/ TAMARA N. BAINES
TAMARA N. BAINES
Sr. Assistant City Attorney
Georgia Bar No. 032460

Attorney for Defendant Facemyer